



U.S. Department of Justice

*United States Attorney  
Eastern District of New York*

AB:EAG/AL  
F. #2010R00153

271 Cadman Plaza East  
Brooklyn, New York 11201

April 21, 2011

By ECF

The Honorable Kiyo A. Matsumoto  
United States District Judge  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

Re: United States v. Andrew Russo, et al.  
Criminal Docket No. 11 CR 30 (SLT)

Dear Judge Matsumoto:

In connection with the Court's request at a conference held today in the above-referenced case, the government writes to advise the Court of the defendants' access at the Metropolitan Detention Center in Brooklyn, New York ("Brooklyn MDC") to audio recordings that were provided in discovery. Today, a staff attorney at the Brooklyn MDC advised that the incarcerated defendants will be permitted to review discovery materials during their allotted semi-weekly sessions in the law library at the Brooklyn MDC (i.e., two 2.5 hour periods each week). In addition, the staff attorney advised that the defendants will be permitted to review discovery on Mondays, Wednesdays and Fridays between 6:00 p.m. and 9:00 p.m. in the visiting room or in a vacant housing unit.

Respectfully submitted,

LORETTA E. LYNCH  
UNITED STATES ATTORNEY

By: /s/  
Elizabeth Geddes  
Allon Lifshitz  
Assistant U.S. Attorneys

cc: All Counsel of Record